

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
BRETT GILLETTE,  
Defendant.

NO. CR24-035 JHC

## DISCOVERY PROTECTIVE ORDER

BRETT GILLETTE,  
Defendant

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant BRETT GILLETTE, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following **PROTECTIVE ORDER**:

## 1. Protected Material

The following documents and materials are deemed Protected Material. The United States will make available copies of the Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team). This category of Protected Materials will be marked and labeled as "Protected Material":

1                   a.     Interviews of minor victim(s); and  
2                   b.     Personal identifying information concerning minor victim(s).

3                   2.     Scope of Review of Protected Material

4                   Defense attorneys of record and members of the defense team may display and  
5                   review the Protected Material with the Defendant. The attorneys of record and members  
6                   of the defense team acknowledge that providing copies of the Protected Material to the  
7                   Defendant and other persons is prohibited and agree not to duplicate or provide copies of  
8                   Protected Material to the Defendant and other persons.

9                   3.     Consent to Terms of Protective Order

10                  The provisions of the protective order shall apply to all members of the defense  
11                  team, including but not limited to other attorneys, contract attorneys, investigators, legal  
12                  assistants, interns, experts, and paralegals. It is the responsibility of defense counsel to  
13                  ensure that all members of the defense team understand the restrictions of the protective  
14                  order and understand that they are required to abide by those restrictions.

15                  4.     Parties' Reciprocal Discovery Obligations

16                  Nothing in this order should be construed as imposing any discovery obligations  
17                  on the government or the defendant that are different from those imposed by case law and  
18                  Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

19                  5.     Filing of Protected Material

20                  Any Protected Material that is filed with the Court in connection with pre-trial  
21                  motions, trial, sentencing, or other matter before this Court, shall be filed under seal and  
22                  shall remain sealed until otherwise ordered by this Court. This does not entitle either  
23                  party to seal their filings as a matter of course. The parties are required to comply in all  
24                  respects to the relevant local and federal rules of criminal procedure pertaining to the  
25                  sealing of court documents.

26                  6.     Non-termination

27                  The provisions of this Order shall not terminate at the conclusion of this  
28                  prosecution.

1 DATED this 11th day of March, 2024.  
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10 JOHN H. CHUN  
11 United States District Judge  
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